Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, et al., individually and on behalf of others similarly situated,
 	
     Plaintiffs,
 	
v.
 	
OPENAI INC., et al.,
 	
     Defendants.
	No. 1:23-cv-08292-SHS
	No. 1:23-cv-10211-SHS
	
	DECLARATION OF KATIE LYNN JOYCE

I, Katie Lynn Joyce, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a partner at Keker, Van Nest & Peters LLP, and counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI, LLC, OpenAI GP, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC (hereafter "OpenAI") in this action. I have personal knowledge of the facts set forth below and if called as a witness, could testify competently thereto.

2. In this case, as of November 21, 2024, OpenAI has agreed to run more than 600 search terms across the files of 24 OpenAI custodians.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of November 2024 in San Francisco, CA.

By: *Katie Lynn Joyce*
Katie Lynn Joyce